Mr. Michael O'Brien
Federal-Mogul Corporation
402 Royal Road
Michigan City, IN 46360

Re: SMF **091-9505**
First Significant Modification to
FESOP 091-5568-00091

Dear Mr. O'Brien:

Federal-Mogul Corporation was issued a permit on September 17, 1997, for a windshield wiper manufacturing operation. The permit was issued under a prior company name, Cooper Automotive, ANCO Products. The Office of Air Management has determined that it is necessary to reopen this permit because hourly PM-10 limits must be derived for the shotblasting operations to ensure compliance with 326 IAC 2-8. You were previously contacted by Dave Cline, OAM Compliance, and Kathy Moore, OAM Permits, regarding this change. Additional changes have been made as requested by the source and to update the wording of several conditions. Pursuant to the provisions of 326 IAC 2-8-11, a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following changes:

(1) Changes in the PM-10 limit for the shotblasting operations from 55.6 tons per rolling 365 day total to an hourly allowable emission rate for each blaster, totaling 89.8 tons per year. This change limits total source PM-10 emissions to 99 tons per year.

(2) Revise the wording of the shotblasting testing requirements condition to correct apparent contradictions within the condition

(3) Change the stated capacity of paint booths E-Coat 1 and E-Coat 2 to 4.39 gallons of coating per hour, per booth. There has been no change in the limited VOC and HAP emissions due to this change in the hourly capacity of the booths.

(4) Add additional insignificant activities with applicable requirements to the Source Summary.

(5) Update the compliance monitoring condition and related record keeping requirement for the spray booths.

(6) Update the broken or failed bag detection condition for the shotblasting operations.

(7) Update the opacity condition to reflect changes in the rule language.

(8) Amend the company name on the cover page and reporting forms and in the Source Summary.

(9) Change the Table of Contents as needed.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vickie Cordell, of my staff, at the above address; or by phone at 317-233-1782 or 1-800-451-6027 (press 0 and ask for ext 3-1782).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
VKC
cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
NWRO
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

These limitations will also make 326 IAC 2-2 (PSD) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-8-5(1)]

Compliance stack tests shall be performed for PM and PM_{10} (filterable and condensible) from the belt and cabinet blasters exhausting to stacks 29, 30, 31, and 177. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Permittee shall test for particulate matter and PM_{10} emissions from each of the four (4) baghouses within 180 days of FESOP issuance. This test shall be repeated no less than once every five years from issuance of this permit.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the shot blasting baghouse stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.3.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the shot blasting operation. All defective bags shall be replaced.

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the shot blasting baghouse stack exhaust.

(b) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT and IDEM/Northwest Indiana Office

Federal-Mogul Corporation
402 Royal Road
Michigan City, Indiana 46360

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F091-5568-00091	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 17, 1997

First Significant Permit Modification: SMF 091-9505-00091	Pages Affected: 4, 5, 8, 20, 31, 32, 33, 34, 38, 39, 40, 41, 42, 43, 44 ; 35a & 35b supersede 35
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and submitted to IDEM, OAM.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary windshield wiper manufacturing source.

Responsible Official:	Robert Faulhaber
Source Address:	402 Royal Road, Michigan City, Indiana 46360
Mailing Address:	402 Royal Road, Michigan City, Indiana 46360
SIC Code:	3714
County Location:	LaPorte
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) natural gas-fired burn-off oven, known as EU 33, rated at 1.20 million British thermal units per hour, exhausted through stack 33.

(2) Two (2) natural gas-fired boilers, known as boilers 1 and 2, rated at 4.63 million British thermal units per hour, each, exhausted through stacks 116 and 119, respectively.

(3) Three (3) natural gas-fired boilers, known as boilers 3, 4 and 5, rated at 16.4 million British thermal units per hour, each, exhausted through stacks 120, 121 and 122, respectively.

(4) One (1) paint booth and associated cure and drying ovens, known as E-Coat 1 paint booth, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 46, capacity: 4.39 gallons of coating per hour.

(5) One (1) paint booth and associated cure and drying ovens, known as E-Coat 2 paint booth, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 153, capacity: 4.39 gallons of coating per hour.

(6) One (1) dip tank and associated cure and drying ovens, known as E-Coat 1 main tank, exhausted through stack 39, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

(7) One (1) dip tank and associated cure and drying ovens, known as E-Coat 2 main tank, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

(8) Three (3) belt blasters, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.

(9) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.

(10) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.

(11) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.

(12) Three (3) cabinet blasters, capacity: 80 parts per hour, each.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(2) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(4) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(5) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(6) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(7) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(8) Machining where an aqueous cutting coolant continuously floods the machining interface.

(9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(10) Cleaners and solvents characterized as follows: a)having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or; b)having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(12) Closed loop heating and cooling systems.

(13) Infrared cure equipment.

(14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(15) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(16) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(17) Quenching operations used with heat treating processes.

(18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(19) Heat exchanger cleaning and repair.

(20) Process vessel degassing and cleaning to prepare for internal repairs.

(21) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(22) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(23) Paved and unpaved roads and parking lots with public access.

(24) Asbestos abatement projects regulated by 326 IAC 14-10.

(25) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(26) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(27) On-site fire and emergency response training approved by the department.

(28) Emergency generators as follows: Diesel generators not exceeding 1,600 horsepower, and natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(29) Other emergency equipment as follows: Stationary fire pumps.

(30) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(31) Filter or coalescer media changeout.

(32) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

(33) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(34) Additional Insignificant Activities: Blackening of metal parts; Nitric acid passivation of metal parts; Pretreatment of metal parts in the E-Coat process with aqueous cleaning, phosphating, chromating, and chromic acid conversion coating; Rubber extrusion and curing; Chlorination of rubber elements; Rubber molding; Plastic extrusion and injection molding; Zinc die casting; Graphite coating of rubber elements; Latex dip operation (boot room); Packaging operations; Wastewater treatment operation; Sludge drying; Water-to-air stripper for groundwater remediation; and Soil vapor extraction system.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-1, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

(b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM and IDEM/Northwest Indiana Office may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and IDEM/Northwest Indiana Office copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, IDEM Northwest Indiana Office along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and IDEM Northwest Indiana Office).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and IDEM/Northwest Indiana Office may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) This certification shall be submitted on the attached Certification Form.

(c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

(b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and the IDEM/ Northwest Indiana Office on or before the date it is due. [326 IAC 2-5-3]

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as IDEM, OAM, and IDEM/Northwest Indiana Office may require to determine the compliance status of the source, as specified in Sections D of this permit.

(d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]

(a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans within ninety (90) days after the issuance of this permit, including the following information on each:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;

(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and

(5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

(b) Preventive Maintenance Plans shall be submitted to IDEM, OAM and IDEM/Northwest Indiana Office, upon request and shall be subject to review and approval by IDEM, OAM and IDEM/Northwest Indiana Office.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements of this permit;

(4) For each emergency lasting longer than one (1) hour, the Permittee notified IDEM, OAM and IDEM/Northwest Indiana Office, within four (4) daytime business hours by telephone or facsimile after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Telephone No.: 219-881-6712 (IDEM/Northwest Indiana Office)
Facsimile No.: 219-881-6745 (IDEM/Northwest Indiana Office)

Failure to notify IDEM, OAM and IDEM/Northwest Indiana Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting longer than one (1) hour, the Permittee submitted written notice or facsimile of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

(6) The Permittee immediately took all reasonable steps to correct the emergency.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(33).

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM and IDEM/Northwest Indiana Office, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM and IDEM/Northwest Indiana Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in 326 IAC 2-8-12(g)(2)(B).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

within ten (10) calendar days from the date of the discovery of the deviation.

(b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form(s) or their substantial equivalent.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if IDEM, OAM and IDEM/Northwest Indiana Office determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, and IDEM/Northwest Indiana Office to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and IDEM/Northwest Indiana Office at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and IDEM/Northwest Indiana Office may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM**,** and IDEM/Northwest Indiana Office and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) Delivered by any method and received and stamped by IDEM, OAM and IDEM/Northwest Indiana Office, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, and IDEM/Northwest Indiana Office upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and IDEM/Northwest Indiana Office takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and IDEM/ Northwest Indiana Office, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

(b) An administrative permit amendment may be made by IDEM, OAM, and IDEM/Northwest Indiana Office, consistent with the procedures specified under 326 IAC 2-8-10(b).

(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

(a) A permit modification is any revision to this permit that cannot be accomplished under administrative permit amendment under 326 IAC 2-8-10.

(b) Minor permit modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and IDEM/Northwest Indiana Office takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

(b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and IDEM/Northwest Indiana Office in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).

(b) For each such change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (SIP) provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, IDEM/Northwest Indiana Office, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, and IDEM/Northwest Indiana Office within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner.

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM consistent with the fee schedule established in 326 IAC 2-8-16.

(b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.

(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.

(d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards **[326 IAC 2-8-4(1)]**

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset), not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%), in any one (1) six (6)-minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1)-minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3).

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

(a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.

(b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

(c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

C.7 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

(b) Stacks shall be constructed using good engineering practice (GEP) according to the following equation:

$S = H + 1.5 (L)$ where: S = Stack height, (feet)
H = Height of supporting or nearby structure (whichever is largest), (feet)
L = Lesser dimension (height or width) of the structure chosen for H, (feet)

(c) Any changes in the applicable stacks require prior approval from IDEM, OAM.

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the department.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

No later than thirty-five (35) days before the intended test date. [326 IAC IAC 3-2.1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3).

The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.

(b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.

(d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt correction, shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator if the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification regardless if asbestos is present.

(b) Written notification is to be sent on a form provided by the commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) asbestos removal or demolition start date;

(B) removal or demolition contractor; or

(3) Waste disposal site.

(c) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires prior to a renovation/ demolition the owner or operator must use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Corrective Actions [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

within 180 days from the date on which this source commences operation.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM shall supply such a plan.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than a threshold quantity that is subject to 40 CFR 68:

(a) 40 CFR 68 is an applicable requirement;

(b) The Permittee shall submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirement of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM and IDEM/Northwest Indiana Office that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(c) Provide annual certification to IDEM, OAM and IDEM/Northwest Indiana Office that the Risk Management is being properly implemented.

C.16 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.

(b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

(3) An automatic measurement was taken when the process was not operating; or

(4) The Permittee determines that the process has already returned to operating within “normal” parameters and no corrective action is required.

(d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and IDEM/Northwest Indiana Office within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and IDEM/Northwest Indiana Office that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and IDEM/Northwest Indiana Office reserve the right to utilize enforcement activities to resolve the non-compliant stack test(s).

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Monitoring Data Availability

(a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) When the equipment listed in Section D is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM, OAM and IDEM/Northwest Indiana Office may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and IDEM/Northwest Indiana Office representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and IDEM/Northwest Indiana Office on or before the date it is due. [326 IAC 2-5-3]

(c) Unless otherwise specified in this permit any semi-annual report shall be submitted within thirty (30) days of the end of the six (6) month reporting period.

(d) All instances of deviations from any requirements of this permit must be clearly identified in such reports;

(e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(f) The first report shall cover the period commencing the date of issuance of this permit and ending the last day of the quarter that the permit is issue.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 [326 IAC 22-1]

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

C.22 The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

C.23 This permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

C.24 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

C.25 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

C.26 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

C.27 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

IDEM/Northwest Indiana Office
Gainer Bank Building
504 North Broadway, Suite 418
Gary, Indiana 46402-1921

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1)	One (1) natural gas-fired burn-off oven, known as EU 33, rated at 1.20 million British thermal units per hour, exhausted through stack 33.
(2)	Two (2) natural gas-fired boilers, known as boilers 1 and 2, rated at 4.63 million British thermal units per hour, each, exhausted through stacks 116 and 119, respectively.
(3)	Three (3) natural gas-fired boilers, known as boilers 3, 4 and 5, rated at 16.4 million British thermal units per hour, each, exhausted through stacks 120, 121 and 122, respectively.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating**,** the PM emissions from the five (5) natural gas-fired boilers shall be limited to 0.346 pounds per million British thermal unit heat input. This limitation is based on the following equation with the terms defined in 326 IAC 6-2-3 (a).

$$Pt = (C \times a \times h)/(76.5 \times Q^{0.75} \times N^{0.25})$$

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.1.4 Reporting Requirements

The permittee shall certify within thirty (30) days after the end of the quarter being reported, using the reporting form located at the end of this permit, or its equivalent, that natural gas was fired in boilers 3, 4, and 5 at all times during the report period.

SECTION D.2 FACILITY OPERATION CONDITIONS

(4)	One (1) paint booth and associated cure and drying ovens, known as E-Coat 1 paint booth, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 46, capacity: 4.39 gallons of coating per hour.
(5)	One (1) paint booth and associated cure and drying ovens, known as E-Coat 2 paint booth, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 153, capacity: 4.39 gallons of coating per hour.
(6)	One (1) dip tank and associated cure and drying ovens, known as E-Coat 1 main tank, exhausted through stack 39, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.
(7)	One (1) dip tank and associated cure and drying ovens, known as E-Coat 2 main tank, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal windshield wiper parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings. Note that the paint supplier certifies that each batch of coatings applied to metal contains no greater than 3.5 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) The volatile organic compound (VOC) input to the applicators, including cleanup solvents, in the two (2) paint booths and two (2) dip tanks shall not exceed 93.4 tons per rolling 365 day total. Therefore, the requirements of 326 IAC 2-7 do not apply. This limitation will also make 326 IAC 2-2 not applicable.

D.2.2 Hazardous Air Pollutants

The hazardous air pollutant emissions from the two (2) paint booths and two (2) dip tanks shall be limited as follows:

a) A single hazardous air pollutant (HAP) emissions shall not exceed 9.4 tons per rolling 365 day total.

b) Any combination of HAPs emissions shall not exceed 23 tons per rolling 365 day total.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.3 Particulate Matter (PM) Overspray [326 IAC 6-3-2(c)]

The PM overspray from the two (2) spray booths (E-Coat 1 and E-Coat-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM and IDEM/Northwest Indiana Office reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Particulate Matter (PM) Overspray

The dry filters for PM overspray control shall be in operation at all times when the two (2) spray booths (E-Coat 1 and E-Coat 2) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an over spray emission, evidence of over spray emission, or other abnormal emission is observed.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1 and D.2.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

(8)	Three (3) belt blasters, equipped with a baghouse, exhausted through stack 31; capacity: 1,000 parts per hour, each.
(9)	One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.
(10)	One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.
(11)	One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.
(12)	Three (3) cabinet blasters, capacity: 80 parts per hour, each.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 PM_{10} [326 IAC 2-7]

The PM_{10} emissions from the shot blasting operations shall not exceed the values in the following table:

Shot Blasters	**Allowable PM-10 Emission Rate** (pounds per hour)
Three (3) belt - Stack 31	1.976 each
One (1) cabinet - Stack 30	1.647
One (1) cabinet - Stack 29	3.386
One (1) cabinet - Stack 177	7.906
Three (3) cabinet - Fugitive	0.551 each

This is equivalent to a PM_{10} limit of 89.89 tons per 365 consecutive day period for the shot blasting operations. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blasting facilities shall not exceed the values in the following table:

Shot Blasters	**Process Weight** (pounds per hour)	**Allowable PM Emission Rate** (pounds per hour)
Three (3) belt - Stack 31	450 each	1.509 each
One (1) cabinet - Stack 30	375	1.335
One (1) cabinet - Stack 29	771	2.164
One (1) cabinet - Stack 177	1800	3.820
Three (3) cabinet - Fugitive	36 each	0.551 each

The pounds per hour limitations were calculated with the following equation:

ORIGINAL PAGE 35 HAS BEEN REPLACED
BY PAGES 35a AND 35b,
see file: Pages35.wpd.

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant Activities

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Water-to-air stripper for groundwater remediation (CP 091-2335) issued January 13, 1992 classified as exempt.

Soil vapor extraction system (CP 091-2660) issued February 8, 1994 classified as exempt.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.3 Volatile Organic Compounds (VOC)

Pursuant to Exempt Construction and Permit Status No. 091-2660 issued February 8, 1994 for the vapor extraction system:

The VOC concentration of the exhaust air from the 150 actual cubic feet per minute blower shall be in the range of 46 to 200 parts per million. Any change or modification which may increase potential emissions of VOC in excess of either three (3) pounds per hour or fifteen (15) pounds per day from the equipment covered in the exemption letter must be approved by the Office of Air Management before such change may occur.

D.4.4 Volatile Organic Compounds (VOC)

Pursuant to Exempt Construction and Permit Status No. 091-2335 issued January 13, 1992 for the water-to-air stripper:

The potential VOC emissions from the 200 gallon per minute water-to-air stripper were calculated to be 0.046 pounds per hour (1.1 pounds per day). Any change or modification which may increase potential emissions of VOC in excess of either three (3) pounds per hour or fifteen (15) pounds per day from the equipment covered in the exemption letter must be approved by the Office of Air Management before such change may occur

D.4.5 Preventive Maintenance Plan [326 IAC IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

State Form 47738 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and IDEM/Northwest Indiana Office

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, IN 46360
Mailing Address: 402 Royal Road, Michigan City, IN 46360
FESOP No.: F 091-5568-00091

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Deviation Occurrence Reporting Form (For Control Equipment Monitoring)

□ Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)

□ Test Result (specify) _____

□ Report (specify) _____

□ Notification (specify) _____

□ Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and IDEM/Northwest Indiana Office

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT
(For Control Equipment Monitoring Only)

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, IN 46360
Mailing Address: 402 Royal Road, Michigan City, IN 46360
FESOP No.: F 091-5568-00091

If a deviation has occurred, a separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)
□ Continuously □ Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400^{0}F, 2-4 psi pressure drop)
Report Covers From: To: (date: month/day/yr)
□ Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and IDEM/Northwest Indiana Office

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F 091-5568-00091

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit . Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
□ Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
□ Permit Has No Content Limitations for this Parameter.
Comments:

State Form 47738 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F 091-5568-00091

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

(can omit boiler affected if only one gas boiler at this plant)

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Management
Compliance Data Section
and IDEM/Northwest Indiana Office

Company Name: Federal-Mogul Corporation
Location: 402 Royal Road, Michigan City, Indiana 46360
Permit No.: 091-5568-00091
Source/Facility: Surface coating booths
Pollutant: VOC
Limit: 93.4 tons per year, based on a 365-day period, rolled on a daily basis.

Month: _____ Year: _____

Day	VOC This Day (tons/day)	VOC Total Last 365 Days (tons)	Day	VOC This Day (tons/day)	VOC Total Last 365 Days (tons)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			**TOTAL**		

Submitted by: _____

Title/Position: _____

Signature: _____

Date _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Management
Compliance Data Section
and IDEM/Northwest Indiana Office

Company Name: Federal-Mogul Corporation
Location: 402 Royal Road, Michigan City, Indiana 46360
Permit No.: 091-5568-00091
Source/Facility: Surface coating booths
Pollutant: Worst Case Single HAPs
Limit: 9.4 tons per year, based on a 365-day period, rolled on a daily basis.

Month: _____ Year: _____

Day	Worst Case Single HAP This Day (tons/day)	Worst Case Single HAP Total Last 365 Days (tons)	Day	Worst Case Single HAP This Day (tons/day)	Worst Case Single HAP Total Last 365 Days (tons)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			**TOTAL**		

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Management
Compliance Data Section

Company Name: Federal-Mogul Corporation
Location: 402 Royal Road, Michigan City, Indiana 46360
Permit No.: 091-5568
Source/Facility: Surface coating booths
Pollutant: Combined HAPs
Limit: 23.0 tons per year, based on a 365-day period, rolled on a daily basis.

Month: _____ Year: _____

Day	Total HAPs this day (ton/day)	Total HAPs for the last 365-day period	Day	Total HAPs this day (ton/day)	Total HAPs for the last 365-day period
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			**TOTAL**		

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Modification to a Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name:	**Federal-Mogul Corporation**
Source Location:	**402 Royal Road, Michigan City, Indiana 46360**
County:	**LaPorte**
SIC Code:	**3714**
Operation Permit No.:	**F 091-5568-00091**
Modification No.:	**SMF 091-9505-00091**
Permit Reviewer:	**Vickie Cordell**

The Office of Air Management (OAM) has reviewed a request for a modification to a Federally Enforceable State Operating Permit (FESOP), F 091-5568-00091, issued to Cooper Automotive, ANCO Products relating to the operation of a windshield wiper manufacturing source. The source name has since been changed to Federal-Mogul Corporation. The IDEM OAM Compliance Data Section and the source requested the following changes:

(1) Correction of the PM-10 limit and testing requirements for the shot blasting facilities.

(2) Change the stated capacity of paint booths E-Coat 1 and E-Coat 2 to 4.39 gallons of coating per hour, per booth.

The name has been amended on the certification and report forms at the end of the permit and on the other pages affected by this modification.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(**Note:** Bolded language has been added to the permit, language with a line through it has been deleted; E-Coat 1 paint booth was called paint booth #1 in the original FESOP.)

(1) One (1) natural gas-fired burn-off oven, known as EU 33, rated at 1.20 million British thermal units per hour, exhausted through stack 33.

(2) Two (2) natural gas-fired boilers, known as boilers 1 and 2, rated at 4.63 million British thermal units per hour, each, exhausted through stacks 116 and 119, respectively.

(3) Three (3) natural gas-fired boilers, known as boilers 3, 4 and 5, rated at 16.4 million British thermal units per hour, each, exhausted through stacks 120, 121 and 122, respectively.

(4) One (1) paint booth and associated cure and drying ovens, known as ~~paint booth #1~~ **E-Coat 1 paint booth**, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 46, capacity: ~~6,000 metal wiper arms and blades~~ **4.39 gallons of coating** per hour.

(5) One (1) paint booth and associated cure and drying ovens, known as E-Coat 2 paint booth, equipped with electrostatic air atomized spray applicators, equipped with dry filters for PM overspray control, exhausted through stack 153, capacity: ~~6,000 metal wiper arms and blades~~ **4.39 gallons of coating** per hour.

(6) One (1) dip tank, known as E-Coat 1 main tank, exhausted through stack 39, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

(7) One (1) dip tank, known as E-Coat 2 main tank, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

(8) Three (3) belt blasters, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.

(9) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.

(10) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.

(11) One (1) cabinet blaster, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.

(12) Three (3) cabinet blasters with fugitive emissions exhausted into the building, capacity: 80 parts per hour, each.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(2) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(4) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(5) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(6) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(7) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(8) Machining where an aqueous cutting coolant continuously floods the machining interface.

(9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(10) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or; b) having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(12) Closed loop heating and cooling systems.

(13) Infrared cure equipment.

(14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(15) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.

(16) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.

(17) Quenching operations used with heat treating processes.

(18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(19) Heat exchanger cleaning and repair.

(20) Process vessel degassing and cleaning to prepare for internal repairs.

(21) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(22) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(23) Paved and unpaved roads and parking lots with public access.

(24) Asbestos abatement projects regulated by 326 IAC 14-10.

(25) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(26) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(27) On-site fire and emergency response training approved by the department.

(28) Emergency generators as follows: Diesel generators not exceeding 1,600 horsepower, and natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.

(29) Other emergency equipment as follows: Stationary fire pumps.

(30) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(31) Filter or coalescer media changeout.

(32) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38°Celsius).

(33) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(34) Additional Insignificant Activities: Blackening of metal parts; Nitric acid passivation of metal parts; Pretreatment of metal parts in the E-Coat process with aqueous cleaning, phosphating, chromating, and chromic acid conversion coating; Rubber extrusion and curing; Chlorination of rubber elements; Rubber molding; Plastic extrusion and injection molding; Zinc die casting; Graphite coating of rubber elements; Latex dip operation (boot room); Packaging operations; Wastewater treatment operation; Sludge drying; **Water-to-air stripper for groundwater remediation; and Soil vapor extraction system.**

Note: The bolded operations were not listed in Section A of the FESOP but were listed in Section D.4 due to specific requirements from prior Exemptions No. 091-2335 issued January 13, 1992, and No. 091-2660 issued February 8, 1994. They have been added to the Insignificant Activities list in Section A for clarity.

Recommendation

The staff recommends to the Commissioner that the modification be approved. This recommendation is based on the following facts and conditions:

The modification to the shot blasting PM-10 limit was requested by the IDEM OAM Compliance Data Section to correct the PM-10 limit and testing requirements for the shot blasting facilities.

The change in the stated capacity of E-Coat 1 paint booth and E-Coat 2 paint booth to 4.39 gallons of coating per hour for each booth results in no change in the total VOC limit of 93.4 tons per year for the surface coating operations.

Information used in this review was obtained from the Compliance Data Section, the FESOP Technical Support Document, and the source contact.

Emissions Calculations

Note: Changes in numeric values in the emission tables are shown with the value from the original FESOP Technical Support Document crossed out and the new number highlighted. This is for emphasis only; there has been no change to the original TSD.

(a) See Appendix A: Emissions Calculations (2 pages) for detailed spray booth calculations.

(b) Potential PM emissions before controls from the shot blasters have been estimated by the applicant and 70 percent of the PM is PM-10 as follows:

Shot Blaster	PM (tons/year)	PM-10 (tons/year)
Three Belt Blasters	103	72
Six Cabinet Blasters	207	145
Total	310	217

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential Emissions (tons/year)
PM	359
PM-10	266
SO_2	0.13
VOC	~~104~~ **131**
CO	7.54
NO_x	30.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
Chloroprene	0.018
Glycol Ethers	12.2
Chromium Compounds	0.014
Lead	0.0004
Nickel Compounds	0.061
Manganese Compounds	0.053
Toluene	0.003
Xylene	~~23.2~~ **55.8**
PERC	0.056
Carbon Disulfide	0.014
Naphthalene	0.010
HCL	0.347
Chlorine	0.011
TOTAL	~~36.0~~ **68.6**

See attached spreadsheet, Appendix A page 2 of 2, for detailed estimates of HAPs from spray coatings. Xylene and Total HAPs values are changed from the original FESOP TSD due to increased hourly capacity and the use of MSDS HAP information for the calculation.

(a) The potential emissions (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

(a) This modification results in an increase in the Limited Potential to Emit of PM-10 from the shot blasting facilities. The shot blasting Potential Emissions are unchanged from those shown in the FESOP Technical Support Document.

(b) The source has accepted a federally enforceable limit on potential to emit PM-10 of 99.0 tons per year, consisting of:

(i) 94.0 tons per year for the significant activities; and

(ii) 5.0 tons per year for the insignificant activities.

This limitation will also satisfy 326 IAC 2-8 and 326 IAC 2-2 (PSD).

(c) The source has accepted a federally enforceable limit on potential to emit VOC of 99.0 tons per year. This limit remains unchanged from the original FESOP, and consists of:

(i) 94.0 tons per year for the significant activities; and

(ii) 5.0 tons per year for the insignificant activities.

This limitation will also satisfy 326 IAC 2-8 and 326 IAC 2-2 (PSD).

(d) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24.0 tons per year for any combination of HAPs. This limit remains unchanged from the original FESOP. This limitation will also satisfy 326 IAC 2-8.

(e) The permit contains provisions that allow the source to use daily records to document compliance with limitations that correspond to 99.0 tons.

(f) The table below summarizes the changes to the total limited potential to emit of the significant and insignificant emission units, due to the changes in the shot blasting PM and PM-10 limitations. There has been no change in the limited VOC and HAP emissions due to the change in the hourly capacity of the surface coating spray booths.

	Limited Potential to Emit (tons/year)			
Process/facility	**PM**	**PM-10**	**VOC**	**HAPs**
Surface Coating	1.16	1.16	93.4	23.0
Combustion	2.95	2.95	0.603	0.00
Shot Blasting	~~55.6~~ **59.13**	~~55.6~~ **89.89**	0.00	0.001
Insignificant Activities	5.00	5.00	5.00	1.00
Total Emissions	~~64.7~~ **68.2**	~~64.7~~ **99.0**	99.0	24.0

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	Attainment
SO_2	Maintenance
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

(b) LaPorte County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12, 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities (Shot Blasters)

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM-10 shall be limited to 99.0 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. (PM-10 was previously limited to 64.7 tons per year.)

The sum of the potential PM-10 emissions from the other operations at the source (surface coating, combustion, and insignificant activities) is 9.11 tons per year. Therefore, the total allowable PM-10 for the shot blasting facilities was determined by subtracting 9.11 tons per year from 99 tons per year. The resulting annual allowable PM-10 for the shot blasters is 89.89 tons per year. The hourly allowable PM-10 rate for the three cabinet blasters with fugitive emissions was set at 0.551 pounds per hour each, the same as the allowable PM emissions rate. Based on 8,760 hours of operation per year, this left 18.869 pounds per hour for the remaining shot blasters. This amount was distributed between the individual shot blasters based on the hourly process weight rates, as shown in the following table:

Shot Blasters	**Allowable PM-10 Emission Rate** (pounds per hour)
Three (3) belt - Stack 31	1.976 each
One (1) cabinet - Stack 30	1.647
One (1) cabinet - Stack 29	3.386
One (1) cabinet - Stack 177	7.906
Three (3) cabinet - Fugitive	0.551 each

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

Compliance is shown by the use of dry filters for overspray control.

The particulate matter (PM) emissions from the shot blasters shall be limited by the following:

Shot Blasters	**Process Weight (pounds per hour)**	**Allowable PM Emission Rate (pounds per hour)**	**Allowable PM Emission Rate (tons per year)**
Three (3) belt - Stack 31	450 each	~~1.51~~ **1.509** each	~~19.9~~ **19.83** total
One (1) cabinet - Stack 30	375	~~1.34~~ **1.335**	5.85
One (1) cabinet - Stack 29	771	~~2.17~~ **2.164**	~~9.51~~ **9.48**
One (1) cabinet - Stack 177	1,800	3.820	~~16.7~~ **16.73**
Three (3) cabinet - Fugitive	36 each	~~0.278~~ **0.551** each	~~3.66~~ **7.24** total
Total			55.6 **59.13**

Note: The hourly allowable emission rates have been adjusted from those listed in the FESOP and the FESOP Technical Support Document. The hourly rates calculated using the process weight rate equation have been truncated, rather than rounded up, to ensure compliance with the rule. The allowable for each of the three cabinet blasters with fugitive emissions has been set at 0.551 pounds per hour, pursuant to revised guidance regarding facilities with a process weight rate less than 100 pounds per hour.

Compliance will be verified by stack testing of stacks 29, 30, 31, and 177.
Changes to the shot blasting limit and testing requirement conditions in the permit are as follows:

D.3.1 PM_{10} [326 IAC 2-7]

The PM_{10} emissions from the shot blasting operations shall not exceed ~~55.6 tons per rolling 365 day total.~~ **the values in the following table:**

Shot Blasters	Allowable PM-10 Emission Rate (pounds per hour)
Three (3) belt - Stack 31	**1.976 each**
One (1) cabinet - Stack 30	**1.647**
One (1) cabinet - Stack 29	**3.386**
One (1) cabinet - Stack 177	**7.906**
Three (3) cabinet - Fugitive	**0.551 each**

This is equivalent to a PM_{10} limit of 89.89 tons per 365 consecutive day period for the shot blasting operations. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blasting facilities shall not exceed the values in the following table:

Shot Blasters	**Process Weight (pounds per hour)**	Allowable PM Emission Rate (pounds per hour)
Three (3) belt - Stack 31	**450 each**	~~1.51~~ **1.509** each
One (1) cabinet - Stack 30	**375**	~~1.34~~ **1.335**
One (1) cabinet - Stack 29	**771**	~~2.17~~ **2.164**
One (1) cabinet - Stack 177	**1800**	3.820
Three (3) cabinet - Fugitive	**36 each**	~~0.278~~ **0.551** each

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ **where E = rate of emission in pounds per hour; and**
P = process weight rate in tons per hour.

These limitations will also make 326 IAC 2-2 (PSD) not applicable.

D.3.4 Testing Requirements [326 IAC 2-8-5(1)]

~~The Permittee shall conduct stack testing for PM and PM_{10} (filterable and condensible) utilizing methods acceptable to the Commissioner. The initial test shall be used to establish a ratio between PM and PM_{10} and future tests shall be for PM_{10} only. Unless the two (2) particulate fractions are such that PM = PM_{10}, then a test for PM only shall be considered acceptable for future compliance demonstrations.~~ **Compliance stack tests shall be performed for PM and PM_{10} (filterable and condensible) from the belt and cabinet blasters exhausting to stacks 29, 30, 31, and 177. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.** The Permittee shall test for particulate matter and PM_{10} emissions from each of the four (4) baghouses within 180 days of FESOP issuance. This test shall be repeated no less than once every five years from the issuance of this permit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Some compliance requirements have been updated in this modification to reflect current standard language. Bolded language has been added to the permit, the language with a line through it has been deleted.

The compliance monitoring requirements applicable to the surface coating facilities are as follows:

D.2.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray while one or more of the booths are in operation.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an over spray emission, evidence of over spray emission, or other abnormal emission is observed.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.8 Record Keeping Requirements

(b) To document compliance with Condition D.2.6, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

The compliance monitoring requirements applicable to the shot blasting facilities are as follows:

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the shot blasting baghouse stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.3.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the shot blasting operation. All defective bags shall be replaced.

D.3.7 Broken ~~Bag~~ or ~~Failure~~ **Failed Bag** Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

(b) ~~Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

These monitoring conditions are necessary because PM-10 emissions must be limited to below the Title V levels. The dry filters for the paint booths and baghouses for the shot blasting processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Additional Changes to Original FESOP Conditions

Condition C.3 (Opacity) has been modified for consistency with the November 1, 1998, update to 326 IAC 5. The condition is now as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 ~~(Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%)~~ opacity in twenty-four (24) consecutive readings,~~ **in any one (1) six (6)-minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%)~~ opacit~~y for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1)-minute non-overlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

Conclusion

The operation of this windshield wiper manufacturing source will be subject to the conditions of the attached proposed FESOP Significant Modification No. SMF 091-9505-00091.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Cooper Automotive Company**
Address City IN Zip: **Michigan City, IN 46306**
Permit/Plt ID #: **SMF 091-9505-00091**
Reviewer: **Vickie Cordell**
Date: **June 29, 1998**

E-Coat Paint Booths 1 & 2

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Coating Usage Rate* (gal/hour)	Pounds VOC per gallon of coating less water	**Pounds VOC per gallon of coating**	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
W49491	9.67	27.64%	0.00%	27.64%	0.00%	63.43%	4.39	2.67	2.67	11.73	281.60	51.39	**47.09**	4.21	65%
W49385	9.67	27.67%	0.00%	27.67%	0.00%	62.47%	4.39	2.68	2.68	11.75	281.91	51.45	47.07	4.28	65%
W49484	9.57	28.37%	0.00%	28.37%	0.00%	62.86%	4.39	2.72	2.72	11.92	286.05	52.20	46.13	4.32	65%
MHSW49409	8.59	31.99%	0.00%	31.99%	0.00%	58.69%	4.39	2.75	2.75	12.06	289.52	**52.84**	39.32	4.68	65%
W49436	9.61	27.98%	0.00%	27.98%	0.00%	63.47%	4.39	2.69	2.69	11.80	283.30	51.70	46.58	4.24	65%

State Potential Emissions, per booth: 12.06 289.52 52.84 47.09

State Potential Emissions, both booths: **105.68** **94.18**

METHODOLOGY

* Maximum usage rate expressed as gallons per hour, rather than units/hr x gallons/unit, due to the widely varying size and units per hour of pieces coated.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
HAP Emissions from Surface Coating

Company Name: Cooper Automotive Company
Plant Location: Michigan City, IN 46306
Permit No./Plt ID: SMF 091-9505-00091
Permit Reviewer: V. Cordell
Date: June 29, 1998

E-Coat Paint Booths 1 & 2 (usage and emissions PER BOOTH)

Material	Density (Lb/Gal)	Maximum Coating Usage Rate (gal/hour) *	Weight % MEK	Weight % Xylene	MEK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total State Potential Emissions from Indiv. Facility (ton/yr)
W49491	9.67	4.39		15.00%		**27.89**	**27.89**
W49385	9.67	4.39		5.00%		9.30	9.30
W49484	9.57	4.39		15.00%		27.60	27.60
MHSW49409	8.590	4.39	10.00%	5.00%	16.52	8.26	24.78
W49436	9.610	4.39		15.00%		27.72	27.72
Maximum Annual HAP Emissions, per booth:					16.52	27.89	27.89
Maximum Annual HAP Emissions, both booths:					**33.03**	**55.78**	**55.78 Max. Annual HAPs**

METHODOLOGY

* Maximum usage rate expressed as gallons per hour, rather than units/hr x gallons/unit, due to the widely varying size and units per hour of pieces coated.

HAPS emission rate (tons/yr) = Density (lb/gal) * Max Applied (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 pound